APPENDIX C

SAMPLE PA NARRATIVE REPORT

This appendix provides a sample narrative report for a fictitious site. The report follows the form and content discussed Section 4.2. Example reference material for information sources cited in the report are also included.

Due to format and space constraints of this guidance document, not all references are reproduced as they should appear in a typical PA narrative report. Not included in this example report are:

- ! Full-size maps such as USGS topographic quadrangles.
- ! Copies of pertinent sections or pages of published documents. Only the title pages are included here.
 - ! Original photographs accompanying the photodocumentation log.

PRELIMINARY ASSESSMENT PALMETTO LANDFILL PALMETTO COUNTY, SOUTH CAROLINA TDD NO. Y9-8765-43

JUNE 10, 1991

XYZ CORPORATION

Prepared By

Joseph Brown Project Manager Reviewed By

Alexander Bell PA Section Leader Approved By

George Washington
Office Manager

Date: June 10, 1991

Prepared by: Joseph Brown, XYZ Corporation

Region 4, Atlanta, Georgia

Site: Palmetto Landfill

6250 Palmetto Drive

Palmetto County, South Carolina

EPA ID No.: SCD123456789

TDD No.: Y9-8765-43

1. INTRODUCTION

Under authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA), the U.S. Environmental Protection Agency (EPA), Waste Management Division, Region 4 conducted a Preliminary Assessment (PA) at the Palmetto Landfill site in Palmetto County, South Carolina. The purpose of this investigation was to collect information concerning conditions at the Palmetto Landfill sufficient to assess the threat posed to human health and the environment and to determine the need for additional CERCLA/SARA or other appropriate action. The scope of the investigation included review of available file information, a comprehensive target survey, and an offsite reconnaissance (May 7, 1991).

2. SITE DESCRIPTION, OPERATIONAL HISTORY, AND WASTE CHARACTERISTICS

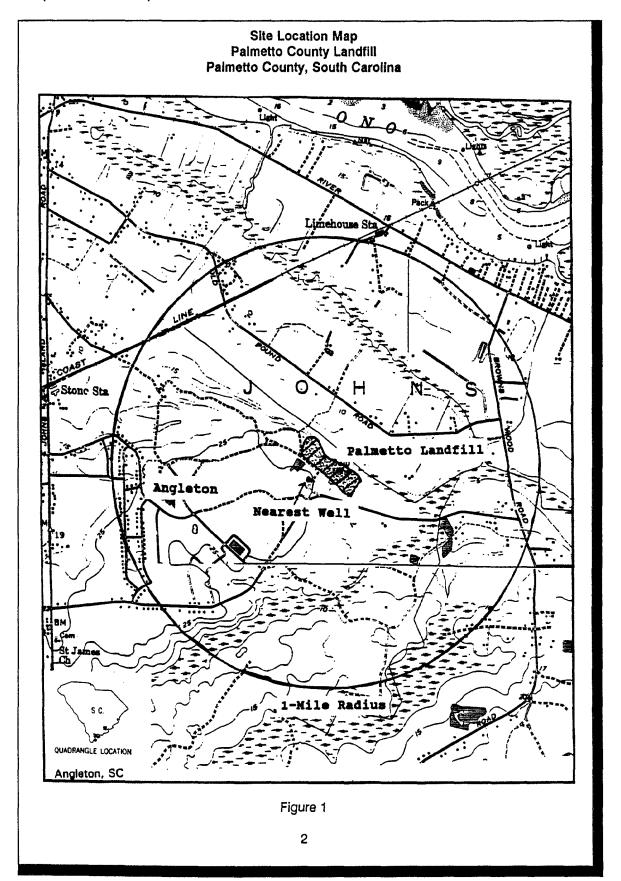
2.1 Location

Palmetto Landfill is located at 6250 Palmetto Drive in a rural area of Palmetto County, South Carolina, just east of the town of Angleton (Figure 1). The geographic coordinates are 18° 28' 43" N latitude and 66° 07' 33" W longitude (Reference 1; Reference 2). To reach the site, travel east from the town of Angleton approximately 1.5 miles on Rt. 149, and turn left on Palmetto Drive. The site is approximately 0.25 mile from the intersection of Rt. 149 and Palmetto Drive.

Palmetto County is characterized by a mild, temperate climate. Summers are warm and humid with daily temperatures reaching 90° F or higher. The winter months are generally mild with daily average temperatures of 55° to 60° F. Mean annual precipitation is 46 inches, while net precipitation for the area is 10.87 inches (Reference 3, pp. 7.10).

2.2 Site Description

The total area of the landfill property is approximately 10 acres, of which approximately 6 acres were used for disposal of wastes (Reference 4). The landfill property is located on relatively flat terrain that slopes gently toward the northeast boundary (Reference 5) and Wildlife Creek, a small, slow flowing stream (Reference 6, p. 124). The landfill property is rectangular in shape and bordered on three sides by a perimeter ditch approximately 8 to 10 feet deep (Reference 4) (Figure 2).



The original purpose of the perimeter ditch was to intercept ground water upgradient of the site and direct it around the buried waste (Reference 4). Since the ditch is only 8 to 10 feet deep, it does not fulfill this function as it does not completely transect the aquifer. It does, however, create a barrier to runoff from areas upgradient of the site. Along the banks of the perimeter ditch there is evidence of stressed vegetation (Reference 5). Water in the ditch is an orange/brown color and is oily in appearance (Reference 5; Reference 7, p. 4).

There are no buildings or other structures on the property. The perimeter of the property is fenced, the fencing appears to be in good condition, and there is a locked entrance gate across the access road to the facility (Reference 5; Reference 7, p. 3).

2.3 Operational History and Waste Characteristics

Smith and Moore Disposal Services, 1111 Main Street, Angleton, South Carolina, owns Palmetto Landfill and operated it from 1970 to 1980. The landfill was opened in April 1970 for the disposal of municipal garbage and household debris. Beginning in October 1978, the landfill accepted industrial waste on a limited basis. Smith and Moore kept no formal records of the amounts and types of wastes received. However, there is evidence indicating that the landfill received a one-time shipment of approximately 500 gallons of TCE waste (Reference 4). The common practice of disposal at Palmetto Landfill was to excavate trenches 7 to 10 feet deep, fill the trenches with waste material, and emplace a daily cover of soil. Landfilling operations were discontinued in July 1980 when the landfill reached capacity. Upon closure, a two-foot soil cover was placed over the entire landfill and seeded (Reference 4).

Palmetto Landfill operated under permit number 999-999 issued by the South Carolina Department of Health and Environmental Concerns (SCDHEC). SCDHEC personnel conducted an inspection of the landfill when it closed to ensure that all closure requirements of the permit were met. SCDHEC personnel have since inspected the landfill several times at irregular Intervals. To date, no sampling or response action has taken place at Palmetto Landfill (Reference 8).

3. GROUND WATER PATHWAY

3.1 Hydrogeologic Setting

Palmetto County is in the Lower Coastal Plain Physiographic Province. Geologically this area is characterized by a wedge of overlapping formations that increase in thickness towards the coast. Pleistocene terrace deposits underlie the Palmetto County area. These deposits include the following formations (from youngest to oldest): Jacksonville, Charlestown, Peerless, and Jacob. The deposition of these formations resulted from the transgressive/regressive sequences of a glacially controlled Pleistocene sea (Reference 9, p. 12). According to the literature and local well logs, the Jacksonville, Charlestown and Peerless Formations are the only Pleistocene strata underlying the vicinity of Palmetto Landfill; only the Jacksonville produces potable water (Reference 9; Reference 10; Reference 11).

The Jacksonville Formation (5 to 25 feet thick) is composed of well-sorted, fine-grained sand and shell with interfingering layers of silt and clay. This formation is the only water supply aquifer for rural residents not served by a municipal system (Reference 10). The water is produced under water table conditions at a rate of 25 to 100 gpm (Reference 9, p. 14).

The Charlestown Formation consists of a sandy phosphatic limestone which has altered to a clayey, fine-grained dolomite at depth. The formation is considered to be a confining unit and has an estimated thickness of 25 to 45 feet in the southern Palmetto County area (Reference 9, p. 16).

The Peerless Formation consists of a porous, dark gray, fine-grained, fossiliferous limestone. This unit is approximately 45 to 60 feet thick, is under artesian conditions, and produces brackish water. Beneath the limestone is the Jacob Formation (60 to 105 feet thick) consisting of sand, silt and clay. The Jacob Formation also produces brackish water (Reference 9, pp. 17-19).

The Jacksonville Formation is the only water supply aquifer in the area of Palmetto Landfill. Precipitation is the primary means of recharge. Discharge other than by well production is by natural seepage (springs) and evapotranspiration. Flow direction for this surficial aquifer varies from area to area as water moves by gravity, from areas of high to low elevations. Depth to ground water varies from 3 to 15 feet below land surface (bls) in Palmetto County (Reference 9, p. 15; Reference 10). At Palmetto Landfill, the depth to ground water is approximately 10 feet, as determined from a well log of a nearby drinking water well (Reference 11).

3.2 Ground Water Targets

The majority of the population within a 4-mile radius relies on municipal water supplies taken from a reservoir, operated by the Palmetto County Water Authority (PCWA), on the Ono River 35 miles west of Angleton. There are three municipal water systems within a 4-mile radius of Palmetto Landfill, all of which purchase water from the PCWA. Residences not connected to the municipal supply system have been identified through discussions with PCWA officials (Reference 12), review of a municipal water supply distribution map (Reference 13), and verification during the reconnaissance of the immediate site vicinity (Reference 7, p.11). These residences rely on private wells completed in the Jacksonville Formation for their drinking water supply (Reference 9; Reference 10).

There are approximately 239 homes within 4 miles which use private wells for drinking water (Reference 13). At 2.7 persons per household (the average for Palmetto County) (Reference 14, p. 4), this equates to 645 residents. The nearest residence relying on a private drinking water well is approximately 300 feet southwest of the landfill (Figure 1); within a 0.25-mile radius of the landfill are 6 residences relying on private wells (Reference 7, p. 10).

3.3 Ground Water Conclusions

A release of hazardous substances from Palmetto Landfill to the Jacksonville aquifer is suspected due to the trenching method of waste disposal, shallow depth to aquifer, and documented deposition of TCE waste. Due to the relatively high conductivity (16 ft/day) (Reference 9, p. 14), potential for widespread migration of contaminants is high. Six residences within 0.25 mile are considered primary targets.

4. SURFACE WATER PATHWAY

4.1 Hydrologic Setting

Overland drainage from the site flows northeast approximately 250 feet into Wildlife Creek, which has an average flow rate of 5 to 10 cfs (Reference 6, p. 124). Drainage from the perimeter ditch around the landfill also flows into the creek (Reference 5; Reference 7, p. 3).

The perimeter drainage ditch which bounds most of the landfill prevents upgradient runoff from reaching the landfill surface. The ditch creates a localized drainage basin coincident with the landfill. Wildlife Creek flows approximately 3.0 miles and enters Ono River (Reference 1), which has an average flow of 1,150 cfs (Reference 6, p. 132). Approximately 16 miles downstream, the Ono River merges with the East River (Reference 6, p. 150).

4.2 Surface Water Targets

There are no drinking water intakes located within 15 downstream miles of the site. Most residents are served by a reservoir 35 miles upstream of Palmetto Landfill. Residents not served by a municipal system obtain drinking water from individual private wells (Reference 12).

Wildlife Creek and Ono River are used for recreational fishing. Aquatic species commonly caught include large mouth bass, shrimp, crabs, and clams. Recreational crawfish fishing occurs in Wildlife Creek and the surrounding wetlands (Reference 15, pp. 13, 15).

There are numerous wetlands located within 15 downstream miles of the site. The nearest wetland (approximately 250 acres, 0.5 mile frontage) is located approximately 0.1 mile downstream from the site on Wildlife Creek (Figure 1, Figure 2) (Reference 1). Two Federally designated endangered species, the Bald Eagle and the Salt Marsh Harvest Mouse, can be found in Palmetto County (Reference 16).

4.3 Surface Water Conclusions

There are indications of a release of contaminants to surface water. The banks of the perimeter ditch, which drains directly into Wildlife Creek, show signs of stressed vegetation. The water in the ditch is an orange-brown color and has an oily sheen (Reference 5; Reference 7, p. 4). There are no drinking water intakes within 15 miles downstream of the site. There are numerous wetlands along Wildlife Creek and Ono River, and two Federally designated endangered species are found in Palmetto County. Primary targets include the fishery in Wildlife Creek and wetlands associated with Wildlife Creek, and the habitats of endangered species in Palmetto County which may also be associated with Wildlife Creek.

5. SOIL EXPOSURE AND AIR PATHWAYS

5.1 Physical Conditions

When closed, Palmetto Landfill was covered by 2 feet of clean soil (Reference 4) and is currently heavily vegetated by grass, weeds, and shrubs (Reference 5; Reference 7, p. 2). The site has been closed since 1980 (Reference 4), and is totally fenced around the perimeter. There is also a locked gate across the access road to the site (Reference 5; Reference 7, p. 2).

5.2 Soil and Air Targets

There are no residents or workers onsite. The nearest residence is 300 feet to the southwest, and the nearest school Is located 0.5 mile to the north of the site (Reference 7, p. 10). There are 6 residences within 0.25 mile of the site (Reference 1; Reference 7). The total population within a 4-mile radius of the site is 7,989 (Reference 18) as determined by the GEMS database (Reference 17), supplemented by a windshield survey housecount within 0.5-mile radius of the site (Reference 7, p. 10; Reference 18).

There is a 250-acre wetland located on Wildlife Creek approximately 0.1 mile from Palmetto Landfill (Figure 1, Figure 2) (Reference 1). There is also the possibility that terrestrial sensitive environments of the Federally designated endangered Bald Eagle and Salt Marsh Harvest Mouse habitats may be found within the boundaries of Palmetto Landfill, as the species are known to inhabit Palmetto County (Reference 16).

5.3 Soil Exposure and Air Pathway Conclusions

The soil exposure pathway appears to pose a minimal threat at Palmetto Landfill due to the 2-foot soil cover emplaced when the landfill was closed, the lack of a resident population, and fencing around the entire property. A release to the air is not suspected because the landfill is covered by 2 feet of clean soil and is heavily vegetated. In addition, during the perimeter survey, no odors were detected and there was no indication of any blowing dust or soil (Reference 7, p. 5).

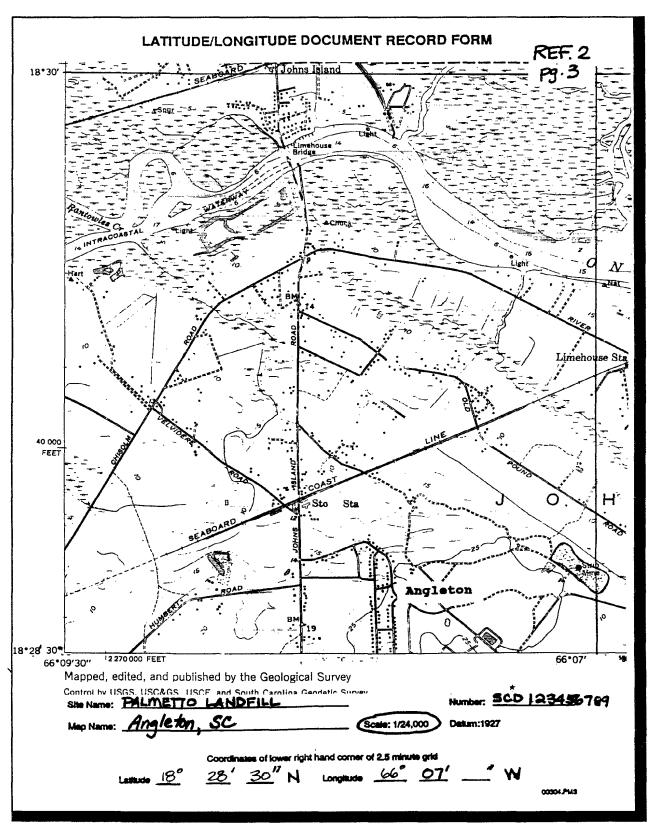
6. SUMMARY AND CONCLUSIONS

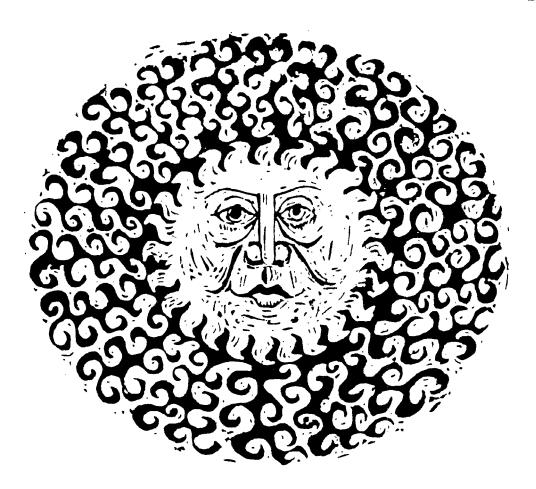
Smith and Moore operated Palmetto Landfill, Palmetto County, South Carolina from 1970 to 1980. During this period, the landfill accepted an unknown quantity of municipal and industrial waste for burial in shallow trenches, including approximately 500 gallons of TCE waste. As a result of this practice, ground water in the vicinity of the landfill may have been adversely affected. Surface water also has a high potential for contamination via drainage from the perimeter ditch, which poses a threat to the environment and to human targets through food chain contamination. Due to the good condition of cover at the landfill and the rural nature of the area, the likelihood of human exposure to contaminated soil is probably minimal. No release to the air is suspected due to the heavily vegetated cover and the lack of any odors or blowing particulates during the site reconnaissance.

REFERENCES

- 1. U.S. Geological Survey, 7.5-minute topographic quadrangle maps of South Carolina: Angleton, 1963, photorevised 1983; Palmetto, 1975; Winchester, 1975; Davers, 1963.
- 2. U.S. Environmental Protection Agency, "Standard Operating Procedure to Determine Site Latitude and Longitude Coordinates," 1991. Calculation worksheet for Palmetto Landfill.
- 3. U.S. Department of Commerce, "The Climatic Atlas of the United States," 1983, pp.7,10.
- 4. Jennifer Doe, Manager for Smith and Moore Disposal Services, telephone conversation with Joe Brown, XYZ Corporation, May 1, 1991. Re: Palmetto Landfill Operations.
- Joseph Brown, XYZ Corporation, Photodocumentation Log of Palmetto Landfill Preliminary Assessment, May 7, 1991.
- 6. A.P. Park, "The Surface Water Resources of Palmetto County, South Carolina," South Carolina Water Resources Commission Report No. 101B, 1984, pp. 124,132,150.
- 7. Joseph Brown, XYZ Corporation, Field Logbook No. 311 for Offsite Reconnaissance of Palmetto Landfill, TDD Y9-8765-43, May 1991.
- 8. John Hill, Technician for South Carolina Department of Health and Environmental Concerns, telephone conversation with Joe Brown, XYZ Corporation, May 1, 1991. Re: Remediation and Sampling at Palmetto Landfill.
- 9. J.P. Adams, "The Ground Water Resources of Palmetto County, South Carolina," South Carolina Water Resources Commission Report No. 99A, 1982, pp. 12, 14, 14, 16, 17, 19.
- Donna Johnson, Driller for Johnson Drilling Co., telephone conversation with Joe Brown, XYZ Corporation, May 1, 1991. Re: Ground Water Wells in Palmetto County.
- 11. Johnson Drilling Company, J.J. Jones Residential Well Log, drilled March 25, 1984.
- 12. Mark Allen, Technician for Palmetto County Water Authority, telephone conversation with Joe Brown, XYZ Corporation, May 2, 1991. Re: Palmetto County Municipal Water Systems.
- 13. Palmetto County Water Authority, Municipal Water Supply Distribution System Map, April 1991.
- U.S. Department of Commerce, Bureau of the Census, "1990 Census of Population and Housing," South Carolina.
- 15. A.J. Houston, "South Carolina Guide to Recreational Hunting and Fishing," South Carolina Department of Natural Resources, Wildlife and Game Division Report Number A22, 1975, pp. 13, 15.
- U.S. Fish and Wildlife Service, "Atlantic Coast Ecological Inventory Maps, Palmetto County Panels," 1980.
- 17. U.S. Environmental Protection Agency, Geographical Exposure Modeling System (GEMS) database, compiled from U.S. Census Bureau 1990 data, accessed May 8, 1991.
- 18. Joseph Brown, XYZ Corporation, 4-mile Radius Population Calculation Worksheet, developed during the Preliminary Assessment of Palmetto Landfill, Palmetto County, South Carolina, May 8, 1991.

REF 2., pg. 2
LATITUDE AND LONGITUDE CALCULATION WORKSHEET #1 WHEN USING CUSTOM RULER OR COORDINATOR (TM)
SITE: PALMETTO LANDFILL NUMBER: SCD123456789
AKA:SSID:
ADDRESS: 6250 PALMETTO DRIVE
CITY: ANGLETON (PALMETTO) STATE: SC ZIP CODE: 22222
SITE REFERENCE POINT: CENTER OF SITE
TOPO HAP: ANGLETON, SC TOWNSHIP: NA N/S RANGE: NA E/V
SCALE: (1:24,000) MAP DATE: 1963 SECTION: 1/4 1/4 1/4
SCALE: (1:24,000) MAP DATE: 1963 SECTION: 1/4 1/4 1/4 MAP DATUN: (1927) MAP DATE: 1963 SECTION: (1927) MAP DATE: (1927) MAP DAT
COORDINATES FROM LOWER RIGHT (SOUTHEAST) CORNER OF 7.5' MAP:
LONGITUDE: 66° 02' LATITUDE: 18° 28' 30"
COORDINATES FROM LOWER RIGHT (SOUTHEAST) CORNER OF 2.5' SUB-HAP:
LONGITUDE: 66° 07' LATITUDE: 18° 28' 30"
CALCULATIONS: LATITUDE (7.5 MINUTE QUADRANGLE MAP)
A) ALIGN THE BOTTOM OF THE SCALE WITH BOTTOM OF GRID. ALIGN THE TOP OF OF THE SCALE WITH THE TOP OF GRID. POSITION EDGE OF RULER OVER SITE REFERENCE POINT WHILE KEEPING TOP AND BOTTOM ALIGNED.
B) READ TICS ON RULER AT 1 OR 0.5 SECOND INTERVALS. (INTERPOLATE IF POSSIBLE)
c) record latitude: <u>18° 28′ 43″</u> N
CALCULATIONS: LONGITUDE (7.5 HINUTE QUADRANGLE HAP)
A) ALIGN THE BOTTOM OF THE SCALE WITH RIGHT SIDE OF GRID. ALIGN THE TOP OF THE SCALE WITH THE LEFT SIDE OF GRID. POSITION EDGE OF RULER OVER SITE REFERENCE POINT WHILE KEEPING TOP AND BOTTOM ALIGNED.
B) READ TICS ON RULER AT 1 SECOND INTERVALS. (INTERPOLATE IF POSSIBLE)
c) record longitude: 66° 07' 33" W
INVESTIGATOR: GO OT 33 W DATE: 6 MAY 1991.





CLIMATIC ATLAS OF THE UNITED STATES

				REF 4
XYZ CORPORATION AND SUBSIDE	ARIES			TELECON NOTE
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Toe Brown,	KYZ Corpor	ration		
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ware filled with wo				
2. Two feet of clean.	soil was pla	ced over the la	ndfill as	cover when
the land fill was a	losed. The	soil was seede	d and trea	s and shrubs
were planted.				
3. 8-10 foot deep per	imeter ditch	around the si	ite that wa	is to drain/
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on a limited bas				
6. No formal recon	ds were ke	pt of the typ	es and qu	antities of
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of approximately	500 gallor	6 of TOE V	vaste.	
7. Operations were	e discontinu	red in July	1980 when	the landfill
reached its pe	rmitted cap	acity.		
		1	about h	Brown
			Projec	Brown t Manager
				

		REF. 5
XYZ CORPORAT	TION AND SUBSID	DIARIES PROJECT NOTE
PHOTO D	OCUMENTA	ation log
		by Joe Brown, Project Manager, during
site rec	connaissan	æ of Palmetto Landfill, May 7, 1991.
Number	Time	Description
	0900	Locked gate-entrance to landfill
	0920	Perimeter fencing - east side of site
_3	0935	Perimeter fencing - west side of site
4	0945	Panaramic viaw of site from gate, showing
		heavy vegetation.
_5,	1000	Probable point of entry of perimeter ditch inte
		Wildlife Creek, northwest side
<u>6.</u>	1010	Probable point of entry of perimeter ditch into
	1040	Wildlife Greek, southeast side
	1040	Water in perimeter ditch, showing orange-brown color, oily shean
8	1100	Panavamic view of site shaving relatively flat
	1100	terrain, gently sloping toward wildlife Geet
9	1105	Stressed vegetation - banks of pavimeter disc
10	1130	Typical vegetation of metlands on mile down
		stream of landfill
	1135	Wildlife Creek taken just downstream of the
		probable point of entry.
		Greek Brown
		Mals 7, 1991
Original	iphoto neg	atives are stored in project file - foo 19-8765-43

THE SURFACE WATER RESOURCES OF PALMETTO COUNTY SOUTH CAROLINA

STATE OF SOUTH CAROLINA



WATER RESOURCES COMMISSION REPORT NUMBER 101B

1984



LEVEL

NOTEBOOK NO. 311

TDD 49-8765-43
Palmetto Landfill
Palmetto Co, S.C.
Project Mgr: Freseph Brown

		REF. 8
XYZ CORPORATION AND SUBSIDIARIE	S ()	TELECON NOTE
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	ity, South Carolina	
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	om April 1970 to Ju	
_	to July 1980) and of	perated under permit
No. 999-999.		
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THE GROUND WATER RESOURCES OF PALMETTO COUNTY SOUTH CAROLINA

STATE OF SOUTH CAROLINA



WATER RESOURCES COMMISSION REPORT NUMBER 99A

1982

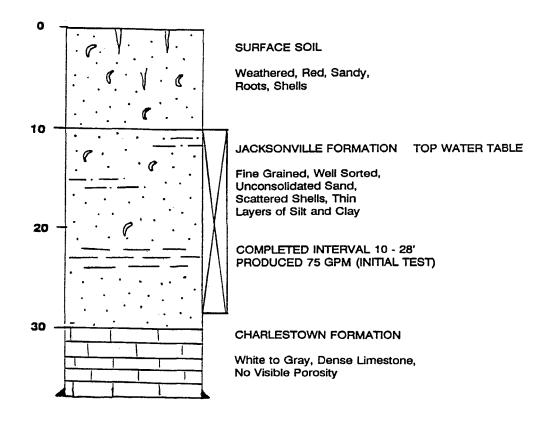
XYZ CORPORATION AND SUBSIDIAR	IES						TELECON NO
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DISTRIBUTION: Palmetto Lanc	JA:11						
Palmetto Gun				na			
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Donna Johnson		I		rilling	Co.	PHONE: (444)	444-4444
AND: Joe Brown, X	IZ G	orpo	<i>ration</i>	·····		· · · · · · · · · · · · · · · · · · ·	
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and that she would s	end i	me i	one.				
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				7	No	1	1991
					, <u></u>	7 7	

JDC

Johnson Drilling Company 1245 Keystone Way Angleton, South Carolina 22222

> J.J. JONES HOUSEHOLD 19 Palmetto Lane Angleton, South Carolina

Drilled March 25, 1984 by Johnson Drilling Company



XYZ CORPORATION AND SUBSIDIARIE	S	TELECON NOTE
	May 2,1991	TIME: 0900
\$295 BAGC\$\$	<u> </u>	0,00
Palmetto Land	•	
	y, South Carolina	
File TDD: y9	- 8765 - 43	1
Mark Allen	PC WA	(333) 533-333
Joe Brown, X	(YZ Corporation	
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system in the vicinity of		
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REF. 13
Municipal Water Supply Distribution System Map obtained from the Palmetto County Water Authority.
(In a typical PA narrative report, the full-size map would be included. Due to the format and space constraints of this guidance document, the map is not included here.)

Census Tracts

SOUTH CAROLINA

STANDARD METROPOLITAN STATISTICAL AREA

Census of Population and Housing

U.S Department of Commerce BUREAU OF THE CENSUS

SOUTH CAROLINA GUIDE TO RECREATIONAL HUNTING AND FISHING



DEPARTMENT OF NATURAL RESOURCES STATE OF SOUTH CAROLINA

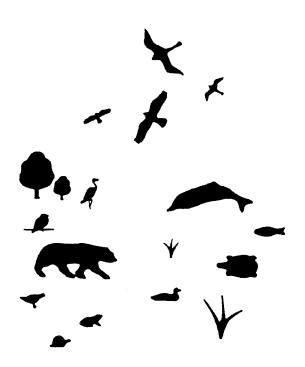
WILDLIFE AND GAME DIVISION REPORT NUMBER A22 1975

33301-A2-ER-111

PALMETTO COUNTY

SOUTH CAROLINA

1:250,000-scale map of ATLANTIC COAST ECOLOGICAL INVENTORY





Produced by
U.S. FISH AND WILDLIFE
SERVICE
1980

GEMS Database Printout

Palmetto Landfill

Latitude: 32:45:23 Longitude: 80:05:05 1990 Population

<u>KM</u>	0.00400	<u>.400810</u>	.810-1,60	1.60-3.20	3.20-4.80	4.80-6.40	SECTOR TOTALS
S1	0	0	188	437	2560	4732	7917
TOTAL	.S 0	0	188	437	2560	4732	7917

Access Date: May 8, 1991

XYZ CORPORATION AND SI	UBSIDIARIES		PROJECT NOT
			7,7,00207,7077
A-Hila Padina	Paulatian 10	Vartcheet	
4-Mile Radius	ropulation v	IO/ ES/RE/	
Total population m	ithin a 4-mile	radius of the	Palmetto Landfill was
			abase (Reference 17)
			le radius performed
luring the site r			
J			
Vistance Category	Residences	Repulation*	Data Source
Onsite		0	Site recon.
. to 0.25 mile	12	32	Site recon.
.25 to 0.5 mile	15	40	Site recon.
.5 to 1 mile	_	188	GENS
to 2 miles		437	GEMS
to 3 miles		2560	GEMS
3 to 4 miles		4732	GEMS
<u> </u>	Total =	7989	
*2.7 persons par	household ava	. for Palmetto	Co. (Reference 14)
		7-	17 Ba
		- Joseph	64 Brown
	***	<i>V V</i>	3-6-91
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